

Grand Rapids Area
Coalition to End Homelessness
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Grand Rapids, MI 49503

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MSHDA-Legal

September 24, 2007

Mary P Levine
Acting General Counsel/Director of Legal Affairs
Michigan State Housing Development Authority
P O Box 30044
Lansing, MI 48909

RE: 2008-2009 QUALIFIED ALLOCATION PLAN FOR THE LOW INCOME HOUSING
TAX CREDIT PROGRAM

Dear Ms. Levine:

The Grand Rapids Area Coalition to End Homelessness has been working since 1985 to address the problem of homelessness in Kent County. The Coalition's participants include more than 70 area institutions and agencies that provide services in the areas of Emergency Shelter, Transitional Housing, and Permanent Supportive Housing, Outreach and Assessment, the HMIS (Homeless Management Information System) and the Community Case Coordination Team (CCCT). The Coalition to End Homelessness addresses local issues, identifies service gaps, and facilitates access to millions of dollars in local, state, and federal funding to address homelessness. Our community's response to homelessness is aided by extensive collaboration across several mainstream systems, which are also represented in the Coalition.

The Coalition has reviewed the proposed Qualified Allocation Plan regarding the use of Low Income Housing Tax Credit Program in Michigan. The Coalition recognizes that the Plan has been devised to target 10% of each housing development produced with the LIHTC in Michigan for people with Special Needs or who are homeless. In addition there are holdbacks for Supportive Housing units for the homeless. As the Coalition is working to implement its Vision to End Homelessness, these holdbacks will provide the permanent housing needed to house the lowest income population, the homeless.

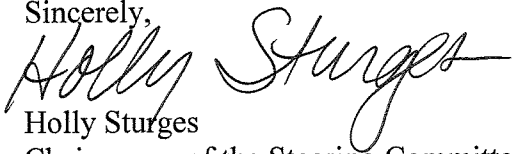
The Coalition's Steering Committee supports the changes proposed for the Qualified Allocation Plan with three reservations. First the Coalition is concerned that the holdbacks may be too restrictive to allow for projects to be funded in Western Michigan .

Second, having had much experience with Supportive Housing Projects as well as Section 8 Moderate Rehabilitation SROs, the community is concerned that the eligibility requirements will exclude the population that the site is built to serve. The Coalition recommends that MSHDA reviews internal as well as other departmental policies such as those of the Human Services Department to avoid eligibility requirements that screen out the chronically homeless.

Third the QAP allows for the construction of new SRO units. The Coalition recommends that at a minimum, a unit should have the status of an efficiency which includes a private bath and kitchen for each resident. Homeless and special needs persons deserve a unit which allows them to be housed with respect and privacy.

Thank you for this opportunity to comment on the proposed Qualified Allocation Plan for the use of Low Income Housing Tax Credits in Michigan. The Coalition is pleased to see that the leadership in reducing the number of homeless persons in our state has been incorporated into the largest financing mechanism for producing housing in our state.

Sincerely,



Holly Sturges

Chairperson of the Steering Committee

Grand Rapids Coalition to End homelessness



Coalition to End Homelessness Shelter Subcommittee

a subcommittee of the Kent County Emergency Needs Task Force promoting the prevention of and end to homelessness

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